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8 **Attorney for Defendant,**
9 **MIKE KESHISHIAN**

10 **UNITED STATES DISTRICT COURT**
11 **FOR THE EASTERN DISTRICT OF CALIFORNIA**

12 **UNITED STATES OF AMERICA,**

13 **Plaintiff,**

14 **v.**

15 **MIKE KESHISHIAN,**

16 **Defendant.**

) **CASE NO.: CR-S-03-184-MCE**

) **EX PARTE APPLICATION FOR**
) **PERMISSION FOR DEFENDANT TO**
) **ATTEND BROTHER'S FUNERAL;**
) **[PROPOSED] ORDER**

17 **— TO THE HONORABLE MORRISON C. ENGLAND, JR., JUDGE OF THE UNITED**
18 **STATES DISTRICT COURT FOR THE EASTERN DISTRICT:**

19 **Defendant Mike Keshishian, by and through his attorney of record, Alex R. Kessel,**
20 **hereby moves this Court for permission to attend the funeral of Krikor “Koko” Keshishian,**
21 **his only brother.**

22 **Defendant Keshishian is willing to pay for the costs of the United States Marshal’s**
23 **Service escort.**

24 **This ex parte application based upon the attached application, the attached supporting**
25 **declaration of Alex R. Kessel, Esq. and all the records on file in this matter.**

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27 **///**

DATED: December 22, 2005

Respectfully submitted,

/S/
ALEX R. KESSEL
Attorney for Defendant
MIKE KESHISHIAN

DECLARATION OF ALEX R. KESSEL

I, ALEX R. KESSEL, declare:

- 1. I am the attorney of record for defendant Mike Keshishian.**
- 2. Defendant's oldest brother (his only brother), Krikor "Koko" Keshishian, passed away on December 20, 2005, from a heart attack.**
- 3. Defendant Keshishian was sentenced by this Honorable Court to eighteen months for Medi-Care fraud. The defendant is currently serving his sentence at U.S.P. Victorville, in Victorville, California. Defendant's current release date is August 31, 2006.**
- 4. Defendant Mike Keshishian wishes to attend the funeral which is scheduled for Thursday, December 29, 2005, at 12:00 p.m., at Hollywood Forever, located at 6000 Santa Monica Boulevard, Los Angeles, California, 90038, telephone number (323) 469-6349.**
- 5. Defendant Mike Keshishian is willing to pay the costs for the United States Marshal's Service escort.**
- 6. I request that this Honorable Court order the Bureau of Prisons to allow Defendant Keshishian to attend the funeral of his only brother.**

DATED: December 22, 2005

**/S/
ALEX R. KESSEL, DECLARANT**

ORDER

GOOD CAUSE APPEARING, IT IS HEREBY ORDERED that the United States Marshal's Service escort inmate MIKE KESHISHIAN (registration number 26901-112), to the funeral of his brother, Krikor "Koko" Keshishian. Defendant Keshishian is to be returned to Victorville USP forthwith after the burial.

DATED: 12/23/05

/s/ Morrison C. England, Jr.
HONORABLE MORRISON C. ENGLAND, Jr.
UNITED STATES DISTRICT COURT JUDGE